

Docket No. 740756-2713
Application No. 10/774,432
Page 6

REMARKS

By way of the present response, claims 17, 19, 21, 23, 25 and 27 are amended, and new claims 29-34 are added to provide coverage for what Applicants are entitled. Claims 17-34 currently are pending. In view of the above amendments and the remarks advanced below, Applicants respectfully request reconsideration and withdrawal of the rejections of the claims.

The final Office Action maintained the rejection of claims 21, 22, 27 and 28 under 35 U.S.C. § 103 as allegedly being obvious over Yamazaki et al. (U.S. Patent Publication No. 2001/0006827, hereinafter, "the '827 publication") in view of Yamazaki et al. (U.S. Patent Publication No. 2002/0187567, hereinafter, "the '567 publication"). On page 8 of the Action, the Examiner states that Applicants' arguments presented in the November 23, 2005, response, were not considered persuasive. More specifically, the Examiner alleges that the arguments are largely directed to what the cited references teach individually and fail to consider the combination of the references. However, contrary to the Examiner's allegations, Applicants' arguments, at page 6, clearly discuss the proposed combination of the '827 and '567 publications, as follows:

Additionally, the '827 publication discloses moving a substrate in an X or Y direction in a step of spraying an EL material to the substrate but does not disclose moving the substrate in the step of evaporating an EL material as claimed. Also, with reference to paragraph 0056 of the '567 publication, spraying is performed either by moving a substrate in the X direction or in the Y direction, or fixing the substrate and scanning the nozzle in the in the X direction or in the Y direction. The '567 publication does not, however, disclose moving the nozzle while moving the substrate. Hence, even if one were to consider *arguendo* combining the teachings of the '827 and '567 publications as proposed, such hypothetical combination would not have taught or suggested moving the nozzle while moving the substrate.

It is to be noted that paragraph 0056 of the '567 publication mentions performing spraying EL material by moving *either* the substrate (with the nozzle fixed, see Figure 2A, 2B) *or* the nozzle (with the substrate fixed). That is, they are performed in the alternative, and not in combination. Thus, no combination of the method described in the '827 publication with the teachings relied upon from the '567 publication would have led one of ordinary skill in the art to arrive at a process of reciprocating an evaporation source in the X direction while moving the substrate in the Y direction at a constant speed, as set forth in claims 21 and 27.

Moreover, neither the '827 publication nor the '567 publication disclose the claimed feature

W722849.1

Docket No. 740756-2713
Application No. 10/774,432
Page 7

of "reciprocating an evaporation source," as presently recited in claims 21 and 27.

Additionally, it appears the Examiner fails to appreciate the disparate technologies associated with depositing materials by spraying or by evaporating from a material source. As instructed in MPEP § 2141.01(a), to rely on a reference under 35 U.S.C. 103, it must be analogous prior art. In the present case, a spraying method in accordance with the present invention involves fundamentally different way of material deposition from that of depositing material by evaporation from a source. As such, one of ordinary skill in the art would not have been led to combine teachings '567 publication's disclosure related to spraying a material with methods utilizing an evaporation source.

Furthermore, in connection with motivation for combining the references, the Examiner states, "the motivation for combining the references [was] given in the rejection" (see, page 8, line 6). However, the stated motivation, "to achieve excellent film thickness uniformly ... the evaporation source" (see, page 3, lines 15-17), is not related to spraying a liquid as described in the '567 publication, and there is no suggestion whatsoever in the '567 publication of depositing a film by a method involving an evaporation source. Therefore, the motivation supplied is not from the prior art, but instead is based on conjecture, which is insufficient for establishing a *prima facie* case of obviousness. See MPEP §§ 2143 and 2143.01.

For at least these reasons, and those presented in the November 23, 2005, response, the rejection under Section 103 of claims 21 and 27, and hence also of dependent claims 22 and 28, should be withdrawn.

The Office Action also includes a rejection of claims 17, 19, 23 and 25 under 35 U.S.C. § 103 as allegedly being obvious over the '827 publication in view of Takacs et al. (U.S. Patent No. 6,244,212). Insofar as this rejection to may be considered to apply to the amended claims, Applicants respectfully traverse.

Amended claim 17 now recites, among other features, that a film is deposited by repeatedly moving first and second evaporation sources in an X direction, and that the first evaporation source and the second evaporation source are provided in a same chamber in which the film is deposited. Similarly, claim 19 is amended to recite that the first evaporation source and the second evaporation source are provided in a same chamber in which the film is deposited. Similar features are recited in claims 23 and 25 with respect to an EL material.

W722849.1

Docket No. 740756-2713
Application No. 10/774,432
Page 8

Support for these features is found throughout Applicants' original disclosure, for example, in the abstract, in Figures 1 and 8, and paragraphs 0015, 0025, 0032, 0062 and 0136.

With respect feature recited in claim 19 and 25, "the first evaporation source and ... are provided in a same chamber," at page 6, lines 7-10 of the Action, the Examiner asserts, "Since all the evaporation chambers are connected to each other, the Examiner interprets each [of the] evaporation chambers as a compartment to obtain one whole system as shown in figure 7, and the whole system is considered as one chamber." It is respectfully submitted, however, that such an interpretation is unreasonable and inconsistent with the meaning "chamber" has in the art of film evaporation. See, for example, *In re Morris*, 127 F.3d 1048, 1054-1055, 44 USPQ2d 1023, 1027-1028 (Fed. Cir. 1997), for guidance in connection with how the PTO interprets terms of the art. Moreover, even considering the plain English meaning of "chamber" is a room, compartment or enclosed space, the apparatus shown in Figure 7 of the '827 publication has a plurality of compartments or closed spaces. Indeed, the first part of the above statement by the Examiner, "all the evaporation chambers are connected to each other" is consistent with the meaning of "chamber" (in the plurality), but the second part "the whole system is considered one chamber" is not. That is, the whole system depicted in Figure 7 of the '827 publication, as understood by those of ordinary skill in the art, would not be considered a single evaporation chamber, but rather, a plurality of evaporation chambers connected in line. For instance, page 6, paragraphs 0076 to 0082 describe that each of the chambers 702 to 710 are hermetically sealed from one another by gates which are not depicted in the figure. Thus, the plurality of evaporation chambers cannot reasonably be considered a single chamber as the Examiner proposes. However, in hope of advancing the prosecution and to make this feature abundantly explicit, claims 17 and 19 now recite that first and second evaporation sources are provided in a same chamber in which the film is deposited, and claims 23 and 25 now recite that first and second evaporation sources are provided in a same chamber in which the EL material is deposited. It is respectfully submitted that the neither the '827 publication nor the Takacs et al. patent, whether considered individually or in any combination, teach or suggest such a feature as now recited in claims 17, 19, 23 and 25.

Consequently, no *prima facie* case of obviousness exists with respect to claims 17, 19, 23 and 25 and the '827 publication and the Takacs et al. patent. Accordingly, it is

W722849.1

Docket No. 740756-2713
Application No. 10/774,432
Page 9

respectfully submitted that claims 17, 19, 23 and 25 are allowable.

Claims 18, 20, 24 and 26 are rejected under 35 U.S.C. § 103 as being obvious over the '827 publication in view of Takacs et al., and in further view of the '567 publication.

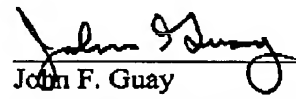
However, it is respectfully submitted that the '567 publication fails to remedy the deficiencies pointed out above claims 17, 19, 23 and 25, from which claims 18, 20, 24 and 26 depend.

Hence, dependent claims 18, 20, 24 and 26 also are considered allowable. Further, these dependent claims recite additional features setting forth combinations including further points of distinction not taught or suggested in the applied documents.

New dependent claims 29-34 depend from one of independent claims 17, 19, 21, 23, 25 and 27, and are therefore allowable at least for the above reasons, and further for the additional features recited.

For all the foregoing reasons, it is respectfully submitted that the present application is in condition for allowance. Prompt notification of the same is earnestly sought.

Respectfully submitted,


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W722849.1